

IN THE UNITED STATES DISTRICT COURT  
FOR DISTRICT OF DELAWARE

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HONEYWELL INTERNATIONAL INC.,  
and HONEYWELL INTELLECTUAL  
PROPERTIES INC.,

Plaintiffs,

v.

HAMILTON SUNDSTRAND  
CORPORATION,

Defendant.

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Civil Action No. 99-309-GMS

**DECLARATION OF DANIEL WINTER IN SUPPORT OF DEFENDANT  
HAMILTON SUNDSTRAND CORPORATION'S BILL OF COSTS**

I, Daniel Winter, declare as follows:

1. I am managing member of Chicago Winter Company, LLC ("Chicago Winter"), a firm that provides graphics support for trial lawyers. I make this declaration on the basis of personal knowledge and on the basis of information relating to the work performed by Chicago Winter Company in Honeywell International Inc., et al. v. Hamilton Sundstrand Corporation.

2. Chicago Winter assisted the law firm of Bartlit Beck Herman Palenchar & Scott ("Bartlit Beck") in connection with a trial held in Wilmington, Delaware in March 2006, in which Bartlit Beck represented Hamilton Sundstrand Corporation ("HSC").

3. Chicago Winter sent HSC four invoices for its work in connection with the 2006 trial. They are as follows:

- Invoice 146, dated February 10, 2006, for \$18,952.50;
- Invoice 152, dated February 22, 2006, for \$34,676.75;
- Invoice 162, dated March 29, 2006, for \$49,940.81; and
- Invoice 185, dated May 17, 2006, for \$8,636.30.

I understand that copies of these invoices are being attached to HSC's Bill of Costs.

4. The total amount invoiced was \$112,206.36. The invoices include both a charge for time spent as well as expenses. The amount billed for time was \$94,583.75, with \$17,622.61 for expenses. HSC paid those invoices.

5. With respect to the amount billed for time incurred (\$94,583.75), most of it was solely for the creation of graphics and demonstrative exhibits for the 2006 trial. However, a small amount of the time was for meetings with Bartlit Beck attorneys (representing billings of \$7,043.78). Those meetings involved both discussions with attorneys and real-time creation of graphics. I conservatively estimate that 50% of the time spent in the meetings with Bartlit Beck attorneys involved the real-time creating graphics. The actual number is likely higher.

6. Of the total amount invoiced by Chicago Winter and paid by HSC in connection with time incurred in graphics support for the 2006 trial, at least \$91,061.86 was on the creation of graphics and demonstrative exhibits. (I arrived at this number by subtracting \$3,521.89, which is half of the cost of the time in the meetings with Bartlit Beck, from the total of \$94,583.75).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of July 2008.



Daniel Winter